

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

**UNITED STATES OF AMERICA §
VS. § CASE NO. H-21-00281
HIEN NGO VO §
Defendant §**

**UNITED STATES' UNOPPOSED MOTION TO DISCLOSE
DISCOVERABLE MATERIAL PURSUANT TO PROTECTIVE ORDER**

COMES NOW the United States of America through Jennifer B. Lowery, Acting United States Attorney, and Rodolfo Ramirez, Assistant United States Attorney, and request the Court permit the disclosure of discoverable information pursuant to a protective order restricting disclosure.

THE UNITED STATES REQUEST that the discoverable information being made available by the United States to the defendant and his attorney of record not be discussed or disclosed to anyone other than the named defendant and his attorney of record, or the staff of his attorney of record (including investigators, paralegals, expert witnesses, and other contracted agents associated with the attorney of record for purposes of defense preparation), except upon the express authorization of this Court and that under no circumstance should copies be provided to any defendant or left at any detention facility for their review. The defense attorney may share the

discovery with the defendant electronically, but the defendant may not copy, print, take photos, take notes, or retain a copy for himself. Further, the United States request this protective order also extend to any and all reports or other discoverable materials subsequently provided to the defense, except for the defendant's own statements.

THE UNITED STATES FURTHER REQUEST the Court order that any attorney receiving the above-described items not disclose any information therein other than to prepare for trial and for the defense of his client.

WHEREFORE, the United States respectfully request this Court permit disclosure consistent with the above request.

Respectfully submitted,

JENNIFER B. LOWERY
Acting United States Attorney

By: /s/ Rodolfo Ramirez
RODOLFO RAMIREZ
Assistant United States Attorney
(713) 567-9420

Certificate of Service

I hereby certify that the foregoing United States' Unopposed Motion to Disclose Discoverable Material Pursuant to Protective Order was filed on June 16, 2021 and a copy served electronically by the Court's CM/ECF System on all counsel of record.

/s/ Rodolfo Ramirez
Assistant United States Attorney

Certificate of Conference

I certify that undersigned counsel for the United States has conferred with counsel for the defendant and that counsel is unopposed to this motion and proposed order granting disclosure consistent with this motion.

/s/ Rodolfo Ramirez
Assistant United States Attorney